

Federal Defenders
OF NEW YORK, INC.

Southern District
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January 5, 2024

BY ECF

Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Michael Edwards and Carlos Mercado
23-Cr-578

Dear Judge Crotty:

I represent defendant Michael Edwards in the above-captioned case. I write to request a 60-day adjournment of the status conference currently scheduled for January 9, 2024.

Mr. Mercado and Mr. Edwards were arraigned on an indictment on November 13, 2023, and both have been released on bond. The Government made its first post-indictment discovery production to counsel for Mr. Edwards and Mr. Mercado on December 29, 2024. The parties are actively reviewing the discovery the government recently produced, and need an opportunity to discuss that discovery with the respective defendants and conduct an appropriate investigation.

Given the ongoing discovery review, I write to request an approximately 60-day adjournment of the upcoming status conference. The parties are available March 11, March 14, or March 15. We are happy to provide other dates if those are not convenient for the Court.

I have consulted with Mr. Mercado's counsel, and he joins in this request. I have also consulted with the government, which has no objection.

As to both defendants, the defense consents to the exclusion of time under 18 U.S.C. § 3161(h)(7)(a), as this additional period of time is necessary for discovery review.

Sincerely,



Michael Arthus
Assistant Federal Defender
212-417-8760

cc. (by ECF): Matthew Kluger, Esq.; AUSA Jerry Fang

1/5/2024

An adjournment will be granted to February 13, 2024 at 12:30PM. Time will be excluded through February 13, 2024. SO ORDERED.

